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7 Attorneys for Defendant
FACEBOOK, INC.

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

13 In re FACEBOOK PPC Advertising
Litigation,

15 This Document relates To:
All Actions.

Master File Case No. C 09-03043 JF

**JOINT STIPULATION EXTENDING TIME
ON MOTIONS RELATED TO PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

19
20 Pursuant to L.R. 6-2, counsel for defendant Facebook, Inc. ("Facebook") and lead trial
21 counsel for Plaintiffs stipulate as follows:

22 WHEREAS, the deadline for Plaintiffs to file their Motion for Class Certification is
23 currently July 15, 2011;

24 WHEREAS, the parties have been diligently conducting discovery related to the Motion
25 for Class Certification and other issues;

26 WHEREAS, Plaintiffs believe additional time is needed to conduct further discovery prior
27 to Plaintiffs filing their Motion for Class Certification, including taking additional depositions;

28 WHEREAS, Facebook has agreed to join in this Stipulation in exchange for Plaintiffs'

1 agreement to certain discovery limitations as set forth in the June 14, 2011 letter agreement
2 among counsel for Facebook and Plaintiffs;

3 WHEREAS, there have been no previous time modifications, whether by stipulation or
4 Court Order;

5 WHEREAS, the below time modification will not impact any other dates previously set
6 by the Court;

7 WHEREAS, pursuant to such agreement, Plaintiffs and Facebook hereby seek an Order
8 from the Court to extend the time for Plaintiffs to file their Motion for Class Certification and to
9 set the class certification briefing schedule as specified below in order to facilitate the completion
10 of certain discovery among the parties and the exchange of expert reports;

11 Now, therefore, Plaintiffs and Facebook stipulate and respectfully request that the Court
12 order as follows:

13 1. Plaintiffs shall have up to and including September 2, 2011 to file their Motion for
14 Class Certification and any accompanying Expert Reports.

15 2. Facebook shall have up to and including October 14, 2011 to file its Opposition to
16 Plaintiffs' Motion for Class Certification and any accompanying Expert Reports.

17 3. Plaintiffs shall have up to and including November 11, 2011 to file their Reply to
18 Facebook's Opposition.

19 4. The time periods above include the time period to depose all experts and both parties
20 will take reasonable efforts to make their respective experts available for deposition within one
21 week of the filing of that expert's report.

22
23 **IT IS SO STIPULATED.**
24
25
26
27
28

1 Dated: June 15, 2011

COOLEY LLP
MICHAEL G. RHODES (116127)
WHITTY SOMVICHIAN (194463)
PETER M. COLOSI (252951)

4 BY: /s/ Whitty Somvichian
WHITTY SOMVICHIAN

6 Attorneys for Defendant
FACEBOOK, INC.

8 Dated: June 15, 2011

SEEGER WEISS LLP

10 BY: /s/ Jonathan Shub
JONATHAN SHUB

11 Attorneys for Plaintiffs

FILER'S ATTESTATION:


Pursuant to General Order No. 45, § X(B) regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from its signatories.

Dated: June 15, 2011

BY: /s/ Whitty Somvichian
Whitty Somvichian (194463)

IT IS SO ORDERED,

Dated: 6/20/11

BY: 
The Hon. Jeremy Fogel
United States District Judge

PROOF OF SERVICE
(FRCP 5)

I am a citizen of the United States and a resident of the State of California. I am employed in San Francisco County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a party to the within action. My business address is Cooley LLP, 101 California Street, 5th Floor, San Francisco, California 94111-5800. My email address is: pmoyes@cooley.com. On the date set forth below I served the documents described below in the manner described below:

• **Joint Stipulation Extending Time On Motions Related to Plaintiffs' Motion for Class Certification**

on the following parties in this action:

☒ (BY U.S. MAIL) I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at San Francisco, California.

on the following parties in this action:

TerriAnne Benedetto
SEEGER WEISS LLP
1515 Market Street, Ste. 1380
Philadelphia, PA 19102

Richard L. Kellner
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Engine Company #28 Building
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Jeffrey Leon
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111 W. Washington Street
Suite 1331
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Harvey Kesner
61 Broadway, 32nd Floor
New York, NY 10006

Executed on June 15, 2011, at San Francisco, California.

Patricia Moyes

PROOF OF SERVICE
(FRCP 5)

I am a citizen of the United States and a resident of the State of California. I am employed in San Francisco County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a party to the within action. My business address is Cooley LLP, 101 California Street, 5th Floor, San Francisco, California 94111-5800. My email address is: pmoyes@cooley.com. On the date set forth below I served the documents described below in the manner described below:

• **Joint Stipulation Extending Time On Motions Related to Plaintiffs' Motion for Class Certification**

on the following parties in this action:

- ☒ (BY U.S. MAIL) I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at San Francisco, California.

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Patricia Moyes